

1 JEFFREY M. TANENBAUM, State Bar No. 104951
2 JOSHUA M. HENDERSON, State Bar No. 197435
3 MATTHEW J. FRANKEL, State Bar No. 256633
4 NIXON PEABODY LLP
5 One Embarcadero Center, 18th Floor
6 San Francisco, California 94111-3600
7 Telephone: (415) 984-8200
8 Fax: (415) 984-8300
9 jtanenbaum@nixonpeabody.com
10 jhenderson@nixonpeabody.com
11 mfrankel@nixonpeabody.com

12 Attorneys for Defendant
13 USS-POSCO INDUSTRIES

14 H. LARRY ELAM III, State Bar No. 178836
15 MARK L. VENARDI, State Bar No. 173140
16 THE VENARDI ELAM FIRM, LLP
17 2033 N. Main Street, Suite 750
18 Walnut Creek, CA, 94596
19 Telephone: (925) 937-3903
20 Fax: (925) 937-3905
21 larry@vefirm.com

22 Attorneys for Plaintiff
23 ROBERT L. DARDEN

24 UNITED STATES DISTRICT COURT
25
26 NORTHERN DISTRICT OF CALIFORNIA

27 ROBERT L. DARDEN,

28 Plaintiffs,

vs.

USS-POSCO INDUSTRIES, a Delaware
corporation; MARIANE SMITH, a California
resident; MICHAEL CONNALLY, a California
resident; and DOES 1-20,

Defendants.

Case No. CV-08-05191-CRB

**STIPULATION REGARDING CASE
SCHEDULE AND ~~PROPOSED~~
ORDER**

Judge: Honorable Charles R. Breyer

Pursuant to the Court's Order of April 24, 2009 and applicable Local Rules and Standing Orders, counsel for the parties in the above captioned action have conferred and agreed and to the following case schedule. The parties hereby respectfully request that the Court enter an Order adopting the agreed-to schedule.

DATE	EVENT
October 13, 2009	Disclosure of expert witnesses and reports
October 19, 2009	Fact discovery cut-off
November 6, 2009	Last day to file dispositive motions
January 5, 2010	Pretrial conference [per Order of the Court dated April 24, 2009]
January 11, 2010	First day of trial [per Order of the Court dated April 24, 2009]

IT IS SO STIPULATED.

Dated: June 15, 2009

THE VENARDI ELAM FIRM LLP

By: /s/ H. Larry Elam III

H. LARRY ELAM III
Attorneys for Plaintiff
ROBERT L. DARDEN

Dated: June 15, 2009

NIXON PEABODY LLP

By: /s/ Matthew J. Frankel

JEFFREY M. TANENBAUM
JOSHUA M. HENDERSON
MATTHEW J. FRANKEL
Attorneys for Defendant
USS-POSCO INDUSTRIES

I attest under penalty of perjury that concurrence in the filing of this document has been obtained from H. Larry Elam III.

Dated: June 15, 2009

By: /s/ Matthew J. Frankel

MATTHEW J. FRANKEL
Attorney for Defendant
USS-POSCO INDUSTRIES

CASE MANAGEMENT ORDER

The foregoing Stipulation Regarding Case Schedule is hereby adopted by the Court as the Case Scheduling Order for the case.

Dated: June 18, 2009

HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT COURT

